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9 Teodoro Nguema Obiang Mangue
10 and Sweetwater Malibu, LLC

11
12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA
14 WESTERN DIVISION

15 12 UNITED STATES OF AMERICA,

16 13 Plaintiff,

17 14 vs.

18 15 ONE WHITE CRYSTAL-COVERED
19 16 "BAD TOUR" GLOVE AND OTHER
20 17 MICHAEL JACKSON
21 18 MEMORABILIA; REAL PROPERTY
22 19 LOCATED ON SWEETWATER
23 20 MESA ROAD IN MALIBU,
24 21 CALIFORNIA; ONE 2011 FERRARI
25 22 599 GTO,

26 23 Defendants.

27 24 CASE NO. CV 11-3582-GW

28 25 **JOINT STIPULATION TO
26 SCHEDEULE STATUS
27 CONFERENCE RE SETTLEMENT**

JOINT STIPULATION AND/OR JOINT MOTION

Claimants Teodoro Nguema Obiang Mangue and Sweetwater Malibu, LLC (collectively “Sweetwater Claimants”) and Plaintiff United States of America, by and through their respective counsel of record, hereby stipulate and agree as follows:

6 WHEREAS, on October 13, 2014, the United States and the Sweetwater
7 Claimants filed a Joint Motion and Stipulation to Remove Actions From Court's
8 Active Calendar and Enforce Settlement Agreement (the "Joint Stipulation")
9 resolving the above-captioned, which was approved by the Court on October 15,
10 2014;

11 WHEREAS, pursuant to the Stipulation, the Defendant *Res* was to be
12 liquidated and the proceeds of that liquidation (“Liquidation Proceeds”) handled by
13 the parties pursuant to the terms of the Joint Stipulation. WHEREAS, pursuant to
14 the Joint Stipulation, the Court retained jurisdiction over this matter;

15 WHEREAS, the United States and the Sweetwater Claimants continue to
16 engage in constructive discussions regarding how to best use the Liquidation
17 Proceeds consistent with the terms of the Stipulation but have not yet finalized a
18 selection of charities to receive these funds; and

19 WHEREAS, the United States and the Sweetwater Claimants agree that a
20 status conference with the Court to discuss and update the Court as to the status of
21 the implementation of the Stipulation's terms is appropriate;

22 NOW, THEREFORE, the parties, by and through their respective counsel of
23 record, hereby stipulate and agree, subject to the Court's approval, as follows:

25 1. A Status Conference should be scheduled for May 20, 2019, or any
26 date that the Court deems appropriate, to provide the Court with a status
27 update regarding the disbursement of the Liquidation Proceeds and other
28 issues related to the Joint Stipulation.

1 IT IS SO STIPULATED.
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5 DATED: March 22, 2019 FISHER & KREKORIAN
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9 By *s/ Kevin Fisher*
10 Kevin Fisher
11 Attorney for Claimants Teodoro Nguema
12 Obiang Mangue and Sweetwater Malibu, LLC
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15 DATED: March 22, 2019 MONEY LAUNDERING AND ASSET
16 RECOVERY SECTION
17 CRIMINAL DIVISION
18 UNITED STATES DEPARTMENT OF JUSTICE
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21 By *s/ Woo S. Lee*
22 Woo S. Lee
23 Attorneys for United States of America
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